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THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY,

Plaintiff,

vs.

CHIANG FANG CHI-YI, an individual;  
CHIANG HSIAO-CHANG, an individual;  
CHIANG YO-MEI, an individual; CHIANG  
TSAI HUI-MEI, an individual; CHIANG YO-  
SUNG, an individual; CHIANG YO-LAN, an  
individual; CHIANG YO-BO, an individual;  
CHIANG YO-CHANG, an individual; CHIANG  
YO-CHING, an individual; CHUNGYAN  
CHAN, an individual; ACADEMIA  
HISTORICA, an entity of The Republic of  
China; CHIANG HSIAO-YEN, an individual;  
CHIANG HUI-LAN, an individual; CHIANG  
HUI-YUN, an individual; CHIANG WAN-AN,  
an individual, and CHIU JU-HSUEH, an  
Individual.

Defendants.

Case No. 5:13-cv-04383-BLF-VKD

**DECLARATION OF ERIC WAKIN IN  
SUPPORT OF PLAINTIFF THE BOARD  
OF TRUSTEES OF THE LELAND  
STANFORD JUNIOR UNIVERSITY'S  
NOTICE OF COMPLIANCE WITH  
ORDER DIRECTING TRANSFER OF  
DEPOSITS [DKT. 404]**

Judge: Hon. Beth Labson Freeman

1 I, Eric Wakin, do hereby attest as follows:

2 1. I am the Deputy Director of the Hoover Institution ("Hoover") at Stanford University  
3 ("Stanford") and am the Director of Hoover's Library & Archives. I make this declaration based  
4 upon my own personal knowledge, and if called as a witness, I could and would testify competently  
5 thereto.

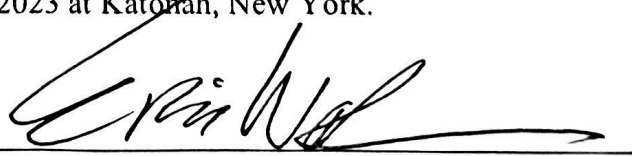
6 2. I submit this declaration in support of Stanford's notice that it has complied with the  
7 Court's July 11, 2023 Order [Dkt. 404] directing Stanford to transfer to interpleader defendant  
8 Academia Historica possession of certain diaries and papers of Chiang Kai-shek and Chiang Ching-  
9 kuo (the "Deposit") within 60 days of the date of entry of that Order, *i.e.*, by September 11, 2023 and  
10 as clarified by the Court's Order of August 21, 2023 [Dkt. 412].

11 3. Stanford offered to make the Deposit available for pick-up by Academia Historica on  
12 September 7, 2023. On September 5, 2023, Academia Historica informed Stanford that it would like  
13 to pick up the Deposit from Stanford on September 11, 2023. Stanford accommodated this request,  
14 and on September 11, 2023, a courier hired by Academia Historica picked up the Deposit in its  
15 entirety from Stanford.

16 4. To the best of my knowledge, the materials picked up by Academia Historica's  
17 courier included all of the materials that were in Stanford's possession that were deposited with it by  
18 Elizabeth Chiang (Chiang Fang Chi-yi) pursuant to the Deposit Agreement dated January 10, 2015.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
20 and correct to the best of my knowledge and belief.

21 Executed this 11<sup>th</sup> day of September, 2023 at Katonah, New York.

22   
23  
24 Eric Wakin

Docket No. CV-13-04383-BLF-HRL  
PROOF OF SERVICE

I am employed in the State of California, in the office of a member of the bar of this Court, at whose direction the service is made. I am over the age of eighteen years, and not a party to the within action. My email and business address is kelly.saunders@pillsburylaw.com and Pillsbury Winthrop Shaw Pittman LLP, 725 South Figueroa Street, 36<sup>th</sup> Floor, Los Angeles, CA 90017-5524. On September 11, 2023, I served the document titled **DECLARATION OF ERIC WAKIN IN SUPPORT OF PLAINTIFF THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S NOTICE OF COMPLIANCE WITH ORDER DIRECTING TRANSFER OF DEPOSITS [DKT. 404]** on the following party in this action as follows:

**See Attached Service List.**

- ☒ **(BY MAIL)** I caused each envelope, with postage thereon fully prepaid, to be placed in the United States mail at Los Angeles, CA. I am readily familiar with the practice of Pillsbury Winthrop Shaw Pittman LLP for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.
- ☐ **(BY FACSIMILE)** The above-referenced document is transmitted by facsimile transmission and the transmission was reported as complete and without error to the numbers listed above.
- ☒ **(BY EMAIL TRANSMISSION)** The above-referenced document is transmitted via electronic transmission to the persons at the electronic-email addresses indicated on the attached Service List.
- ☐ **(BY PERSONAL SERVICE)** I delivered to an authorized courier or driver authorized by \_\_\_\_\_ to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be filed forthwith.
- ☐ **(BY OVERNIGHT COURIER)** I am readily familiar with the practice of Pillsbury Winthrop Shaw Pittman LLP for collection and processing of correspondence for overnight delivery and know that the document(s) described herein will be deposited in a box or other facility regularly maintained by \_\_\_\_\_ for overnight delivery.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11<sup>th</sup> day of September, 2023, at Anaheim, California.

  
 \_\_\_\_\_  
 Kelly Saunders

**Service List**

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